

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

**IN RE**

**NATALIE TAO**

**DEBTOR**

**MDCVA PROPERTIES, LLC**

**MOVANT**

**VS.**

**NATALIE TAO**

**ROBERT S. THOMAS, II, TRUSTEE**

**RESPONDENT(S)**

**BANKRUPTCY NO. 19-18681**

**CHAPTER 13**

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**MOTION FOR RELIEF FROM STAY AS TO PROPERTY KNOWN AS  
1155 WASHINGTON BOULEVARD, BALTIMORE, MD 21230**

MDCVA Properties, LLC, a Maryland Limited Liability Company, (hereinafter "MDCVA") by Gerard F. Miles, Jr., and Huesman, Jones and Miles, LLC, its attorneys pursuant to 28 U.S.C. §1334, 28 U.S.C. §157, 11 U.S.C. §362, and Bankruptcy Rules 4001 and 9014, moves for an Order for Relief From Stay in the captioned case in order that MDCVA can conclude a action to foreclose the right of redemption of King and Queen LLC's ("King and Queen's") interest in real property known as 1155 Washington Boulevard, Baltimore, MD 21230 and for cause states:

1. The real property known as 1155 Washington Boulevard, Baltimore, MD 21230 (hereinafter "Property") is titled to King and Queen, LLC. The Debtor, Natalie Tao, is the owner and resident agent of King and Queen, LLC.

2. MDCVA purchased the Property for twelve thousand six hundred eighty-six and 00/100 dollars (\$12,686.00) at a public auction tax sale on May 18, 2015. *See* certificate of tax sale attached as **Exhibit 1**.
3. There are at least five separate King and Queen entities registered with the State of Maryland that Natalie Tao is either the owner or resident agent of, including a King and Queen, LLC with no listed resident agent, but with the Property listed as the business's Principal Office. One of those businesses, King & Queen, LLC, Department ID Number W18659839, is still active. *See* SDAT Business Entity print-out attached as **Exhibit 2**.
4. The Property has never been deeded by King and Queen to another individual or entity. Because the Property is still owned by King and Queen, the Debtor is not liable for any debts acquired by King and Queen, and the entity remains liable for the debt owed on the property.
5. The Debtor listed the Property as among her assets on her Chapter 13 Bankruptcy Petition. However, as stated above, King and Queen is still the valid owner of the Property. It is Movant's position that this property is not part of the Bankruptcy Estate, as it is owned by an LLC which has not filed bankruptcy. This is not the position of Debtor, as the property was scheduled.
6. King and Queen has failed to pay the lien amount owed under the tax sale.
7. As of August 16, 2019, the amount owed King and Queen pursuant to the tax sale included the following. Debtor is not responsible for this amount:

Lien Amount-	\$12,685.96
Interest-	\$10,781.33

Attorney's Fees and Costs- \$ 3,515.68

Total: \$26,982.97

Interest accrues at a rate of \$6.95 per day.

8. King and Queen has made no post petition payments. Thus, no post petition pay history is being attached.
9. MDCVA does not believe that the automatic stay applies to the Property because it is owned by King and Queen and not the Debtor.
10. The co-debtor stay does not apply because the debt evidenced is not consumer debt, and Natalie Tao is not liable for the amount owed. *See* 11 U.S.C. §1301(a).
11. MDCVA is requesting that this court enter an order declaring that the stay is not in effect so that it may proceed with foreclosing the right of redemption. Alternatively, Movant is requesting an Order lifting the stay.
12. Under 11 U.S.C. §362 (d)(1), the court shall provide relief from the automatic stay “for cause, including the lack of adequate protection of an interest in the property.”
13. The property is not necessary for an effective reorganization of the bankruptcy estate, as the property is not owned by the Debtor.
14. All of the foregoing constitutes cause to grant MDCVA relief from the automatic stay to allow MDCVA to exercise its right to foreclose against the property.

WHEREFORE, MDCVA prays the following relief:

- A. That this Honorable Court enter an Order granting Relief From Stay in the captioned case by recognizing that the property known as 1155 Washington Boulevard, Baltimore, MD 21230 is not owned by the Debtor and not covered by the stay, AND
- B. Allowing it to proceed to foreclose the right of redemption of the property known as

1155 Washington Boulevard, Baltimore, MD 21230; AND

C. For such other and further relief as MDCVA may require.

Respectfully Submitted,  
Huesman, Jones and Miles, LLC

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